

**WITNESS AND EXHIBIT LIST**

<b>UNITED STATES BANKRUPTCY COURT</b> <b>SOUTHERN DISTRICT OF TEXAS</b> <b>HOUSTON DIVISION</b>	
Main Case No. <b>23-34374</b>	Name of Debtor: <b>County Investment L.P., et al.</b>
Adversary No.	Style of Adversary:
Witnesses: • Massood Danesh Pajooch • Brendon Singh • Kelly Toney • Leonard H. Simon • William P. Haddock • Designated Representative(s) of Texas Capital Loans, LLC • Witnesses designated by other parties • Witnesses needed for rebuttal whose testimony cannot be reasonably anticipated prior to the hearing	Judge: <b>Jeffrey P. Norman</b> Courtroom Deputy: <b>Tracey Conrad</b> Hearing Date: <b>November 20, 2023</b> Hearing Time: <b>1:30 p.m.</b> Party's Name: <b>Pendergraft &amp; Simon, LLP</b> Attorney's Name: <b>Leonard H. Simon</b> Attorney's Phone: <b>713-253-2810</b> Nature of Proceeding: <b>1. Texas Capital's Motion to Dismiss Case for Cause for Bad Faith Filing in Contravention of Terms of Confirmed Plan and Little Creek Factors (ECF no. 11)</b> <b>2. Debtors' Amended Motion for Authority to Use Cash Collateral (ECF no. __)</b>

**EXHIBITS**

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Schedules D, E/F (Bk. 21-32933, ECF no. 15)				
2	Order Confirming Consensual Plan of Reorganization for Small Business Under Chapter 11, Subchapter V (Bk. 21-32932, ECF no. 204)				
3	Notice of Substantial Consummation (Bk. 21-32932, ECF no. 273)				

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
4	Post Confirmation Report (Bk. 21-32933, ECF no. 35)				
5	Post Confirmation Report (Bk. 21-32933, ECF no. 38)				
6	County Investment L.P.'s Expedited Motion to Close Case and for Entry of Final Decree (Bk. 21-32932, ECF no. 291)				
7	Order Closing County Investment LP Case, no. 21-32933				
8	Debtors' Expedited Motion for the Appointment of Brendon Singh as Chief Restructuring Officer (ECF no. 3)				
9	Debtors' Expedited Motion for Entry of an Order (a) Authorizing Retention of Tranzon as Auctioneer, (b) Authorizing the Sale by Auction of Real Property Owned by Debtors, (c) Authorizing Payment of Indebtedness Secured by Mortgage Held by CCL and (d) Authorizing Other Relief (ECF no. 13)				
10	Schedule A/B for County Investment L.P. (ECF no. 1)				
11	Schedules D, E/F for County Investment (ECF no. 1)				
12	Schedule A/B for 2017 Partners, LLC (Bk. 23-34375, ECF no. 1)				
13	Schedules D, E/F for 2017 Partners, LLC (Bk. 23-34375, ECF no. 1)				
14	Auctioneer's Estimate of Real Property Values				
15	30-Day Budget				
16	TXU Energy Bill				
17	Harris County MUD 248 Bill (acct. x30-01)				
18	Harris County MUD 248 Bill (acct. x40-01)				
19	Nexus Bill				
20	Profit & Loss Statement—Month Ended August 31, 2023				

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
21	Profit & Loss Statement—Month Ended September 30, 2023				
22	Profit & Loss Statement—Month Ended October 31, 2023				
23	Cash Flow Statement—Quarter Ended October 31, 2023				
24	Cash Flow Statement—Year to October 31, 2023				
25	Summary of Bank Deposits and Withdrawals—June 1, 2023 to October 31, 2023				
26	Wells Fargo DIP Account Bank Statements				
27	Texas Capital Loans Appraisal(s) of collateral (subpoenaed for production at hearing by designated representative(s)).				
	Exhibits designated by other parties				
	Exhibits needed for rebuttal which cannot be reasonably identified prior to the hearing				

Respectfully Submitted,

**PENDERGRAFT & SIMON, LLP**

/s/ William P. Haddock

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*Proposed Counsel for County Investment L.P.  
and 2017 Partners, LLC*

### **Certificate of Service**

I hereby certify that a true and correct copy of the above Witness and Exhibit List has been served on the following counsel/parties of record in accordance with Fed. R. Bankr. P. 9013 and BLR 9013-1 on this 16th day of November 2023:

Counsel/parties appearing via ECF:

Preston Towber, Counsel for Texas Capital Loans, LLC  
Alicia Barcomb, Counsel for the U.S. Trustee  
Office of the U.S. Trustee

/s/ William P. Haddock  
William P. Haddock